

EXHIBIT 8

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

A.J.P. and A.M.P., minors)	CASE NO.
by and through their)	5:22-CV-01291
guardian ad litem Cynthia)	SSS (SHKx)
Nunez, individually and)	
as successor in interest)	
to Albert Perez,)	
deceased; and PATRICIA)	
RUIZ, individually,)	
)	
Plaintiffs,)	
)	
v.)	
)	
COUNTY OF SAN BERNARDINO;)	
and DOES 1-10, Inclusive,)	
)	
Defendants.)	
_____)	

STENOGRAPHIC DEPOSITION VIA VIDEOCONFERENCE OF
HELEN FREGOSO
TUESDAY, JANUARY 30, 2024
10:25 A.M.

Reported By: Dana Mann-Chipkin
CSR No. 14056
Job No. 1089898

1 Q. Did you provide -- I'm sorry, did Albert
2 provide any financial support to your household?

3 A. Not that I'm aware of.

4 MS. ANDERSEN: Okay.

5 All right, that's all the questions I have
6 for now. I'll turn it over to plaintiffs' counsel,
7 Ms. Leap, and then I may have some more questions for
8 follow-up, but thank you, Ms. Fregoso.

9 THE WITNESS: Okay.

10 MS. LEAP: Thank you, Ms. Andersen.

11 EXAMINATION BY

12 MS. LEAP:

13 Q. Good morning, Ms. Fregoso. My name is
14 Shannon Leap. Our office represents the family of
15 Mr. Perez.

16 A. Mm-hmm.

17 Q. I only have a few questions for you.

18 A. Mm-hmm.

19 Q. At any time on the date of the incident, did
20 Mr. Perez point the gun at you?

21 A. No.

22 Q. Did you ever see Mr. Perez point the gun at
23 anyone on the date of the incident?

24 A. No.

25 Q. At any time on the date of the incident did

1 you hear Mr. Perez verbally threaten to harm anyone?

2 A. No.

3 Q. And at any time on the date of the incident

4 did Mr. Perez verbally threaten to harm you?

5 A. No.

6 Q. On the date of the incident, do you recall
7 moving your vehicle at some point?

8 A. No.

9 MS. LEAP: Okay, those are all the questions
10 I have.

11 MS. ANDERSEN: All right.

12 And I don't have any more questions for you,
13 Ms. Fregoso.

14 THE WITNESS: Okay.

15 THE COURT REPORTER: This is the
16 court reporter. Let me just ask Ms. Leap if she's
17 ordering a copy of the transcript.

18 MS. LEAP: I have your email address. If
19 it's okay if our office follows up with you about
20 that...

21 THE COURT REPORTER: Okay.

22 (The deposition concluded at 11:18 a.m.)

23 -oOo-

24

25

DECLARATION UNDER PENALTY OF PERJURY

I hereby declare under penalty of perjury that the foregoing is my deposition under oath; that I have read same; and that I have made the corrections, additions, or changes to my answers that I deem necessary.

In witness thereof, I hereby subscribe my name this _____ day of _____, 2024.

HELEN FREGOSO